

From: Khang Nguyen
To: [WARD, LA WEEDA](#)
Cc: [Danny Luong](#); [Tran Vo](#)
Subject: NSR Determination for Heater H-100
Date: Tuesday, September 27, 2016 11:03:30 AM

Ms. Ward:

You have a question on how we determined Heater H-100 to be a post-NSR equipment. The heater triggered NSR under application C-03108 permitted on 10/19/76. As indicated on page 4 of the report, this application was submitted to replace the burners to allow the heater to fire on both gas and oil fuels (oil firing was needed in the event of gas curtailment). Previously, the heater was permitted to fire only on refinery gas. The evaluation for Permit to Operate for this application stated that there were increases in both NOx and SOx emissions as the result of partially firing on oil fuel. Since the burner replacement was a physical modification to the equipment resulting in emission increases, the heater was subject to NSR since this modification. Oil firing capability was subsequently removed from the heater's permit in 1997 when the heater was equipped with SCR to comply with Rule 1109. Our report could be clearer on how our NSR determination was made.

If you have any further questions, please let me know. Thanks

Khang Nguyen